

SO. CAL. EQUAL ACCESS GROUP
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Attorneys for Plaintiff
YEONG LEE

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

YEONG LEE,

Plaintiff,

vs.

SHEREEN LOTH D/B/A DELICATE
ILLUSIONS; and DOES 1 to 10,
Defendants.

Case No.: 8:25-cv-00637-DOC (DFMx)

**Plaintiff's Notice of Motion and Motion
for Default Judgment by Court**

Date: July 14, 2025

Time: 10:00 a.m.

Courtroom: 10A

Honorable Judge David O. Carter

To Defendant SHEREEN LOTH D/B/A DELICATE ILLUSIONS, and the attorneys of record, if any: Please take notice that on July 14, 2025, at 8:30 a.m., or as soon thereafter as this matter may be heard by this Court located at 411 West Fourth Street, Los Angeles, California, Plaintiff YEONG LEE will present Plaintiff's motion for default judgment against Defendant SHEREEN LOTH D/B/A DELICATE ILLUSIONS. The Clerk has previously entered the default on said Defendant on June 3, 2025 (Dkt. #13).

At the time and place of hearing, Plaintiff will present proof of the following matters: (1) Defendant SHEREEN LOTH D/B/A DELICATE ILLUSIONS, is not a minor or an incompetent person or in military service or otherwise exempted under the

1 Soldier and Sailor's Civil Relief Act of 1940; (2) Defendant SHEREEN LOTH D/B/A
2 DELICATE ILLUSIONS, has not appeared in this action; and (3) Plaintiff is entitled to
3 judgment against said Defendant on account of the claims pleaded in the complaint, to
4 wit: a violation of the Americans with Disabilities Act, the Unruh Civil Rights Act, the
5 California Disabled Persons Act, the California's Unfair Competition Act, and
6 Negligence.

7 The Plaintiff seeks a judgment in the amount of \$4,000.00 in statutory damages,
8 \$2,285.00 in attorney's fees, and \$590.00 in costs as set forth in the attached Declaration
9 of Jason J. Kim and an Order directing the Defendant to: make alterations in such a
10 manner that, to the maximum extent feasible, the goods, services, facilities, privileges,
11 advantages, or accommodations offered by Defendant are readily accessible to and usable
12 by individuals with disabilities at the property located at or about 1857 S. Coast Hwy.,
13 Laguna Beach, California. This motion is based on this notice, the declarations submitted
14 in support of this motion, and other matters which may be presented at the hearing.

15 Notice of the original motion for default judgment by court was served on
16 Defendant SHEREEN LOTH D/B/A DELICATE ILLUSIONS, on June 13, 2025, by first
17 class United States Mail, postage prepaid.

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19 Dated: June 13, 2025

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22 By: /s/ Jason J. Kim
23 Jason J. Kim, Esq.
24 Attorneys for Plaintiff
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